

**MOST FREQUENT DEFICIENCIES  
AS IDENTIFIED FROM  
OSFA PROGRAM REVIEWS  
CONDUCTED DURING FY 95 & 96**

<u>Code</u>	<u>Code Description</u>	<u>Count</u>
2150	FINANCIAL AID TRANSCRIPT MISSING/INCOMPLETE	448
2491	VERIFICATION NOT DOCUMENTED/INCOMPLETE	424
5131	FFEL EXIT COUNSELING NOT DOCUMENTED/PERFORMED	307
2160	INCONSISTENT INFORMATION IN STUDENT FILE	242
5130	FFEL ENTRANCE COUNSELING NOT DOCUMENTED/PERFORMED	215
2360	REFUND CALCULATION INCORRECT	176
0030	FISAP INCOME GRID - INCORRECT/NOT DOCUMENTED	169
3020	ACCOUNTING RECORDS NOT MAINTAINED	161
5140	IMPROPER CERTIFICATION OF FFEL	160
2380	REFUND NOT MADE TO TITLE IV ACCOUNT	158
2400	SATISFACTORY ACADEMIC PROGRESS POLICY NOT ADEQUATELY	145
3080	BANK ACCOUNTS - FEDERAL FUNDS NOT IDENTIFIED	139
2390	SATISFACTORY ACADEMIC PROGRESS STANDARDS NOT ADEQUATELY MONI	136
3110	EXCESS CASH BALANCES MAINTAINED	133
2161	INDEPENDENT STUDENT STATUS NOT DOCUMENTED	117
4180	SARS/ESAR NOT SIGNED	111
2370	REFUND - FAIR AND EQUITABLE POLICY NOT PUBLISHED	108
3171	IMPROPER STUDENT ACCOUNT CREDIT BALANCES	107
5170	LATE FFEL REFUNDS MADE TO LENDERS	107
5110	FFEL CHECK DELIVERY NOT DOCUMENTED	95
2240	INADEQUATE INTERNAL CONTROLS/IMPAIRED ADMINISTRATIVE CAPABIL	94
2371	REFUND CALCULATION - MOST FAIR AND EQUITABLE POLICY NOT USED	92
2245	LACK OF ADMINISTRATIVE CAPABILITY	88
2381	RETENTION OF STUDENT CREDIT BALANCES - UNAUTHORIZED/FAILURE	87
3060	AUDIT TRAIL INADEQUATE/CANNOT TRACE TO PROGRAMS	87
2350	REFUND CALCULATION NOT DOCUMENTED/PERFORMED	81
2030	ADMISSIONS POLICY NOT FOLLOWED/DOCUMENTED	78
2490	VERIFICATION POLICY AND PROCEDURES NOT DEVELOPED/INADEQUATE	77
4040	IMPROPER DISBURSEMENT - FEDERAL PELL GRANT DISBURSED	77
4080	PELL--IMPROPER PELL DISBURSEMENTS	72
2330	REPEAT FINDING - FAILURE TO TAKE CORRECTIVE ACTION	71
2130	ENROLLMENT STATUS NOT VERIFIED BEFORE DISBURSEMENT	68
2335	REFUND - INADEQUATE METHOD OF DETERMINING LAST DAY OF ATTEND	68
4070	IMPROPER FEDERAL PELL GRANT BUDGET/COST OF ATTENDANCE	68
2110	CONSUMER INFORMATION REQUIREMENTS NOT MET	67
2001	ABILITY TO BENEFIT - TESTING REQUIREMENTS NOT MET	66
3000	ACCOUNT RECORDS FOR STUDENTS NOT MAINTAINED	66
3090	BANK CHARGES MADE TO FEDERAL ACCOUNT	63
5070	FAILURE TO CONSIDER ALL FINANCIAL AID WHEN CERTIFYING	63
2320	RECORDS NOT MAINTAINED/RETAINED FIVE YEARS	60
2070	AUDIT REPORT NOT SUBMITTED	59
5210	LENDER NOT NOTIFIED OF STATUS CHANGE IN 60 DAYS	58
2050	ATTENDANCE RECORDS MISSING/IMPAIRED ADMINISTRATIVE CAPABILIT	57
1050	FWS IMPROPER PAYMENTS FOR HOURS WORKED	56
2290	OVERAWARD - FINANCIAL NEED EXCEEDED	55
3100	EDPMS EXPENDITURES - UNTIMELY/INCORRECTLY REPORTED	55
4110	INCORRECT FEDERAL PELL GRANT CALCULATION/CLOCK HOUR OR	54
5230	MISSING FFEL APPLICATION	52
9000	FSEOG EXCEPTIONAL NEED NOT MET	52
9010	FSEOG MATCHING REQUIREMENT NOT MET/UNTIMELY	51

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2200	INELIGIBLE STUDENT - IN DEFAULT ON TITLE IV LOAN	50
5060	FFEL DELAYED DELIVERY REQUIREMENT NOT MET	50
2450	STUDENT CERTIFICATION - MISSING STATEMENT OF SELECTIVE	49
1040	FWS TIME CARDS NOT SIGNED BY SUPERVISOR	46
2270	NEED ANALYSIS IMPROPER/NOT DOCUMENTED	46
5080	FFEL EXPECTED FAMILY CONTRIBUTION - ADJUSTMENTS	45
8100	FEDERAL PERKINS LOAN EXCESS CASH BALANCE MAINTAINED	45
5260	STUDENT CONFIRMATION REPORT FILED LATE/NOT FILED	44
3010	ACCOUNTING RECORDS INADEQUATE	43
2075	AUDIT REPORT NOT SUBMITTED - CLOSED SCHOOL	42
4131	PAYMENT VOUCHERS - FAILURE TO MAKE ADJUSTMENTS	42
5021	FFEL COST OF ATTENDANCE INCORRECT ON LOAN APPLICATION	42
5030	FFEL DEFAULT RATE EXCEEDS 20 PERCENT	41
8210	FEDERAL PERKINS LOAN PROMISSORY NOTE -MISSING/UNSIGNED	41
5190	LEAVE OF ABSENCE - REQUEST NOT DOCUMENTED	40
9005	FSEOG FUNDS NOT MADE REASONABLY AVAILABLE/SELECTION	40
2180	INELIGIBLE PROGRAM - APPROVAL REQUIREMENTS NOT MET	39
5150	IMPROPER FFEL DISBURSEMENT - PAYMENT AFTER STUDENT WITHDRAWA	37
2000	ABILITY TO BENEFIT - TEST NOT DOCUMENTED	36
2170	INELIGIBLE BRANCH/LOCATION	36
3050	AVAILABILITY OF FISCAL RECORDS	36
5221	PROCEEDS OF FFEL NOT DELIVERED WITHIN 45 DAYS	36
2010	INACCURATE RECORDKEEPING	35
2340	REFUND - GSL PROCEEDS RETAINED BY INSTITUTION	34
2250	INSUFFICIENT PERSONNEL/IMPAIRED ADMINISTRATIVE CAPABILITY	33
4000	ACCOUNT CREDITED WITHOUT STUDENT'S PERMISSION	33
4130	PELL--OVERPAYMENT/UNDERPAYMENT	33
3070	FEDERAL PELL GRANT EXPENDITURES DIFFER FROM	32
3120	EXPENDITURES REPORTED ON FISAP REPORT INACCURATE	32
8090	FEDERAL PERKINS LOAN EXIT COUNSELING NOT DOCUMENTED	32
4030	IMPROPER DISBURSEMENT - FEDERAL PELL NOT MADE IN	30
2190	INELIGIBLE STUDENT - CITIZENSHIP	29
4140	PART-TIME FEDERAL PELL GRANT AWARD INCORRECTLY PRORATED	27
0010	CAMPUS-BASED AWARD SELECTION PROCEDURES NOT WRITTEN	26
2080	AWARD NOTIFICATION PROCEDURES NOT DEVELOPED	26
3101	EDPMS CASH ON HAND NOT DOCUMENTED	26
5020	FFEL COST OF ATTENDANCE NOT DOCUMENTED	26
2120	DROP OUT/WITHDRAWAL RATE EXCESSIVE/IMPAIRED	25
3130	EXPENDITURE REPORTS LATE	25
1020	FWS EARNINGS CREDITED TO STUDENT ACCOUNT	24
5141	IMPROPER AWARD - FFEL NOT PRORATED	24
5040	FFEL DEFAULT MANAGEMENT PLAN NOT FULLY IMPLEMENTED/	22
5220	MAXIMUM ANNUAL OR CUMULATIVE FFEL AWARD EXCEEDED	22
8080	FEDERAL PERKINS LOAN DEFAULT RATE EXCEEDS 15 PERCENT/	22
8140	FEDERAL PERKINS LOAN BILLING/COLLECTION PROCEDURES	22
2113	CRIME AWARENESS REQUIREMENTS NOT MET	21
5010	FFEL COST OF ATTENDANCE ADJUSTMENTS NOT DOCUMENTED	21
8190	FEDERAL PERKINS LOAN INSTITUTIONAL MATCHING FUNDS NOT	21
5180	LEAVE OF ABSENCE - EXCESSIVE LENGTH	20
5271	FFEL DISBURSEMENTS ATTRIBUTED TO UNATTENDED/INCORRECT	20

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1010	FWS EARNINGS NOT MONITORED	19
8180	FEDERAL PERKINS PRE-LOAN COUNSELING AND DISCLOSURE	19
1070	FWS JOB DESCRIPTIONS NOT AVAILABLE	18
2431	DRUG ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET	18
3160	INTEREST EARNED ON FEDERAL FUNDS NOT RETURNED TO ED	18
4100	INCORRECT FEDERAL PELL GRANT AWARDS ACROSS ACADEMIC YEARS	18
8240	FEDERAL PERKINS LOAN SCHEDULE OF ADVANCES NOT SIGNED	18
2310	PROGRAM PARTICIPATION AGREEMENT MISSING/ FAILURE	17
2420	STUDENT CERTIFICATION - MISSING STATEMENT OF EDUCATIONAL PUR	17
9040	UNEQUAL FSEOG DISBURSEMENTS	17
1090	FWS MATCHING REQUIREMENTS NOT MET/UNTIMELY	16
3170	IMPROPER TRANSFER OF FEDERAL FUNDS	16
4060	IMPROPER FEDERAL PELL AWARDS TO TRANSFER STUDENTS	16
5280	STUDENTS NOT NOTIFIED OF REFUND TO LENDERS	16
2382	REPAYMENT POLICY OR CASH DISBURSEMENT NOT DEVELOPED/IMPLEMEN	15
2440	STUDENT CERTIFICATION - MISSING STATEMENT OF NON-DEFAULT	15
3040	ADVANCES USED FOR NON-PROGRAM PURPOSES	15
9050	FSEOG DISBURSED WITHOUT FEDERAL PELL GRANT ELIGIBILITY	14
2221	INELIGIBLE STUDENT - HIGH SCHOOL STUDENT	13
2460	STUDENT CERTIFICATION - UNSIGNED STATEMENT OF UPDATED INFORMA	13
5022	FFEL COST OF ATTENDANCE - INCORRECT TUITION AND FEE COMPONENT	13
5120	FFEL CERTIFIED WITHOUT FEDERAL PELL GRANT ELIGIBILITY	13
8110	FEDERAL PERKINS LOAN FUNDS NOT DEPOSITED IN AN	13
2020	ACADEMIC YEAR NOT DEFINED CORRECTLY/INADEQUATE PROGRAM LENGT	12
2260	MISREPRESENTATION - INSTITUTION OR PROGRAM	12
4090	PELL--IMPROPER DISBURSEMENT/WITHOUT VALID SAR/ESAR	12
1100	FWS MISSING FWS TIMESHEETS	11
2300	OWNERSHIP CHANGE NOT REPORTED OR REPORTED LATE	11
3140	FAILURE TO COORDINATE AID - FEDERAL/NON-FEDERAL	11
5181	LEAVE OF ABSENCE - EXCEEDS ONE IN 12-MONTH PERIOD	11
5200	LEAVE OF ABSENCE POLICY NOT WRITTEN	10
8200	FEDERAL PERKINS LOAN NOTES NOT SAFELY MAINTAINED	10
0020	CAMPUS-BASED DISBURSEMENT NOT MADE IN MULTIPLE/EQUAL PAYMENT	9
2100	CONSORTIUM OR CONTRACTUAL AGREEMENT UNAVAILABLE/INADEQUATE	9
5270	SINGLE DELIVERY OF FFEL PROCEEDS/IMPROPER	9
8250	FEDERAL PERKINS LOAN SELECTION POLICY INADEQUATE	9
2090	CLOSED SCHOOL - FAILURE TO SUBMIT AUDIT REPORTS	8
8120	FEDERAL PERKINS LOAN FUND CHARGED FOR UNALLOWABLE	8
0001	ADJUSTMENTS TO FAMILY CONTRIBUTION NOT DOCUMENTED	7
1120	FWS SELECTION POLICY INADEQUATE	7
2112	CREDIT/CLOCK HOUR CONVERSION IMPROPER	7
5240	GSL--RECORDS NOT MAINTAINED/DOCUMENTATION MISSING	7
8000	ADJUSTMENT TO FEDERAL PERKINS LOAN SCHEDULE OF	7
0000	AUDIT ISSUES PENDING	6
2222	FINANCIAL NEED NOT DETERMINED/INCORRECT	6
2410	FAILURE OF CORPORATE/CENTRAL OFFICE TO PROPERLY ADMINISTER	6
4050	IMPROPER DISBURSEMENT - STUDENT SUBMITTED FEDERAL PELL GRANT	6
8220	FEDERAL PERKINS LOAN REPAYMENT SCHEDULE NOT IN FILE/NOT SIGN	6
9020	FSEOG MINIMUM OR MAXIMUM AWARD REQUIREMENT NOT MET	6
2095	COMMISSION/BONUS/INCENTIVE PAID FOR SECURING ADMISSIONS	5

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6/26/97

Code	Code Description	<u>Count</u>
5191	LEAVE OF ABSENCE - STUDENT CHARGED ADDITIONAL FEES	5
8160	FEDERAL PERKINS LOAN INSTITUTIONAL DATA NOT RECONCILED	5
2060	ATTENDANCE REC. - UNDETERMINED WITHDRAWAL/DATE	4
2210	INELIGIBLE STUDENT - NOT MAKING SATISFACTORY ACADEMIC PROGRE	4
2220	INELIGIBLE STUDENT - REFUND OWED TO SFA PROGRAM	4
2312	PROCESSING TITLE IV APPLICATIONS OR FORMS -	4
1060	FWS INELIGIBLE EMPLOYMENT	3
2040	ATTENDANCE POLICY NOT APPLIED	3
2230	JOB PLACEMENT RECORDS INADEQUATE	3
2313	POWER OF ATTORNEY AUTHORIZATION - IMPROPER USE	3
3030	ADMINISTRATIVE COST ALLOWACE EXCEEDS ALLOWABLE MAXIMUM	3
3150	FIDELITY BOND UNAVAILABLE	3
5050	FFEL DEFERMENT IMPROPERLY CERTIFIED	3
8010	ANNUAL FEDERAL PERKINS LOAN SAFEGUARD ACTIVITY REPORT	3
8150	FEDERAL PERKINS LOAN - INCORRECT REPAYMENT SCHEDULE	3
1030	FWS OFF-CAMPUS EMPLOYMENT AGREEMENTS NOT AVAILABLE	2
2114	DENIAL OF ACCESS TO RECORDS	2
2480	TRANSFER OF CREDIT ALTERNATIVE TO ACCREDIATION REQUIREMENT	2
8020	FEDERAL PERKINS LOAN BORROWERS NOT PROVIDED	2
8130	FEDERAL PERKINS LOAN - IMPROPER DEFERMENTS	2
0011	AWARD SELECTION PROCEDURES NOT IN COMPLIANCE WITH REGULATION	1
0040	IMPROPER DISBURSEMENT	1
1000	FWS CARRY FORWARD/CARRY BACK USED INCORRECTLY OR NOT DOCUMEN	1
1080	FWS JOB DISPLACED REGULAR EMPLOYEE	1
2111	CRIME AWARENESS REQUIREMENTS NOT MET	1
2140	FALSIFICATION OF RECORDS	1
2311	FAILURE TO RENEW ELIGIBILITY EVERY FOUR YEARS	1
2430	STUDENT CERTIFICATION - DRUG FREE CERTIFICATION UNSIGNED	1
4010	IMPROP. DISB.-STUDENT SUBMITTED SAR/ESAR WITH	1
4020	PELL--IMPROP. DISB. - PAYMENT AFTER STUDENT WITHDRAWAL	1
4120	PELL--INSTITUTION SUBMITTED SARS AFTER DECEMBER 31	1
5090	FFEL CHECK CASHED WITHOUT STUDENT SIGNATURE	1
5100	FFEL CHECKS DELIVERED BEFORE ENROLLMENT	1
5160	INSTITUTION DID NOT COMPLY WITH PRE-CLAIMS ASSISTANCE REQUES	1
8030	FEDERAL PERKINS LOAN CANCELLATION FOR INELIGIBLE STUDENT	1
9999	UNCLASSIFIED FINDINGS/NO CODE ASSIGNED	1
0035	FLAG FOR 3-YEAR OVER 35% DEFAULT RATE--89 COHORT	0
0060	FLAG FOR OVER 60% DEFAULT RATE--89 COHORT	0
0111	EXPEDITED DETERMINATION LETTER	0
1110	CWS--EXCESS OFF-CAMP. EMPLOYER CONTR. NOT USED	0
2241	FINANCIAL RESPONSIBILITY NOT MET	0
2242	FINANCIAL RESPONSIBILITY NOT MET/NO SURETY	0
2243	FAILURE TO SUBMIT FINANCIAL ANALYSIS DOCUMENT	0
2251	TERMINATION BY GUARANTEE AGENCY	0
2271	SIMPLIFIED NEEDS TEST IMPROPERLY USED	0
2280	REMEDIAL COURSE WORK EXCEEDS ONE ACADEMIC YEAR	0
2325	REMEDIAL COURSEWORK REQUIREMENTS NOT MET	0
2470	TRACK RECORD DISCLOSURE (CURRENTLY SUSPENDED)	0
4150	PAYMENT SCHEDULE INCORRECT/USED INCORRECTLY	0
4160	SAI INCORRECTLY CALCULATED	0

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4170	SARS MAILED TO INSTITUTION	0
4190	STUDENT COPY OF SAR NOT GIVEN TO STUDENT	0
5000	GSL--COMMIS. SALESPERSON PROMOTING PROGRAM/PROVIDING	0
5031	GSL--DEFAULT RATE OVER 35% FOR PAST THREE YEARS	0
5032	GSL--DEFAULT RATE OVER 60% FOR MOST RECENT YEAR	0
5041	GSL--FEDERAL FUNDS USED TO PAYOFF STUDENT'S PRIOR DEFAULTED	0
5151	GSL--IMPROPER DISB. - FAILURE TO RE-CERTIFY ELIGIBILITY	0
5290	GSL--STUDENT NOT ENROLLED AT LEAST HALF-TIME	0
6009	GEN--EXCESSIVE GSL VOLUME	0
6010	GEN--REFUNDS NOT PROCESSED TIMELY	0
6043	LENDER/GEN--Borrower Not Notified of Loan Sale	0
6049	LENDER/GEN--Other Program Deficiencies	0
6060	LENDER/GEN--Falsification of records	0
6061	LENDER/GEN--Other Fraud or Abuse/Referral to OIG	0
6200	INT--120-DAY CHECK CASHING	0
6204	INT--INTEREST MISCALCULATED	0
6212	INT--LATE CONVERSION	0
6213	INT--DISBURSEMENT ERRORS	0
6215	LENDER/GEN--Other Interest Billing Deficiencies	0
6216	INT--UNDERBILLING	0
6219	INT--DEFERMENT/FORBEARANCE ERRORS	0
6220	LENDER/GEN--Inadequate Audit Trail/Documentation	0
6300	SA--120-DAY CHECK CASHING	0
6304	SA--SPECIAL ALLOWANCE MISCALCULATED	0
6312	SA--LATE CONVERSION	0
6313	SA--DISBURSEMENT ERRORS	0
6316	SA--UNDERBILLING	0
6319	SA--DEFERMENT/FORBEARANCE ERRORS	0
6320	LENDER/SA--Inadequate Audit Trail/Documentation	0
6402	LENDER/COL--Inadequate Due Diligence/Telephone Contacts	0
6403	LENDER/COL--Inadequate Due Diligence/Letters	0
6404	LENDER/COL--Inadequate Skiptracing	0
6405	LENDER/COL--Failure to Request Pre-claims Assistance	0
6406	LENDER/COL--Failure to Notify Credit Bureau	0
6409	LENDER/COL--Other Collection Deficiencies	0
6410	LENDER/COL--Claims Not Submittd Before 270 Days Delinquent	0
6701	LENDER/ORIG--Incorrect Calculation	0
6702	LENDER/ORIG--Unpaid Fees	0
6703	LENDER/ORIG--Other Origination Fee Deficiencies	0
6720	LENDER/ORIG--Inadequate Audit Trail/Documentation	0
6800	LENDER/REPORT--Inadequate Support for Portfolio Analysis/Cal	0
7000	GA/DD--INADEQUATE DUE DILIGENCE/TELEPHONE CONTACTS	0
7001	GA/DD--INADEQUATE DUE DILIGENCE/LETTERS	0
7002	GA/DD--INADEQUATE SKIPTRACE PROCEDURES	0
7003	GA/DD--FAILURE TO NOTIFY CREDIT BUREAUS	0
7004	GA/DD--ACCOUNTS NOT LITIGATED	0
7005	GA/DD--MISSING FILES/DOCUMENTATION	0
7006	GA/DD--OTHER POST DEFAULT DEFICIENCIES	0
7100	GA/CLAIMS--TIMELY FILING VIOLATIONS	0
7101	GA/CLAIMS--UNCURED LENDER DUE DILIGENCE VIOLATIONS	0

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7102	GA/CLAIMS--INCORRECT CLAIM AMOUNT	0
7103	GA/CLAIMS--BORROWER PAYMENTS NOT PROPERLY APPLIED	0
7104	GA/CLAIMS--NOT PAID WITHIN 90 DAYS	0
7105	GA/CLAIMS--WRITE-OFF PROCEDURES NOT PROPERLY APPLIED	0
7107	GA/CLAIMS--OTHER CLAIM PAYMENT DEFICIENCIES	0
7200	GA--ED'S EQUITABLE SHARE NOT SUBMITTED WITHIN 60 DAYS	0
7201	GA--INCORRECT EQUITABLE SHARE SUBMITTED	0
7202	GA--UNPAID FEDERAL ADVANCES	0
7203	GA--IMPROPER USE OF ADMIN. COST ALLOWANCE	0
7204	GA--IMPROPER REQUEST FOR ADMIN. COST ALLOWANCE	0
7205	GA--BILLINGS (ED-1130) NOT SUPPORTED BY AGENCY RECORDS	0
7206	GA--NO LST PROCEDURES FOR LENDERS/SCHOOLS	0
7207	GA--REQUIRED BIENNIAL REVIEWS NOT CONDUCTED	0
7208	GA--INSUFFICIENT PROGRAM REVIEW DOCUMENTATION	0
7209	GA--UNAPPROVED WRITE-OFF CRITERIA/PROCEDURES	0
7210	GA--BILLINGS (ED-1189) NOT SUPPORTED BY AGENCY RECORDS	0
7214	GA--FAILURE TO CORRECT PRIOR DEFICIENCIES	0
7215	GA--OTHER GA DEFICIENCIES	0
7999	GA--LIABILITIES ASSESSED FROM GA LENDER AND SCHOOL REVIEWS	0
8040	CANCELLATION IMPROPER OR NOT DOCUMENTED	0
8050	COLLECTION AGENCY FEES NOT DOCUMENTED	0
8060	COLLECTION AGENCY NOT BONDED	0
8070	COLLECTIONS NOT DEPOSITED IN FUND	0
8170	INTEREST INCORRECTLY CALCULATED	0
8211	FEDERAL PERKINS LOAN EXCEEDS MAXIMUM	0
8230	FEDERAL PERKINS LOAN - SAME AGENCY BILLS AND COLLECTS	0
8888	OWNED BY PHILLIPS COLLEGES, INC	0
8889	OWNED BY UES	0
9030	REQUIREMENT FOR FIFTH YEAR NOT MET	0
9998	REQUIRES FOLLOW-UP IN 60 DAYS	0